



**FARM RAISED®
CATFISH**

CATFISH FARMERS OF AMERICA
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**National Animal Identification
Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238**

June 29, 2005

RE: NAIS Comments for Exclusion of Farm-Raised Catfish Pond Culture

ATTENTION: Mr. Neil Hammerschmidt

Catfish Farmers of America (CFA), formed in 1968, is the trade association that represents the interests of the farm-raised catfish industry. Farm-raised catfish accounts for well over one-half of the total production and value of U.S. aquaculture. With membership from forty states, CFA is recognized as the nations strongest aquaculture organization.

This past October 2004, I attended a National Aquaculture Working Group meeting in D.C. to help in the development of a National Animal Identification System (NAIS). The goal is to have the capability to identify all animals and premises that have had direct contact with a foreign animal disease within 48 hours after discovery. USDA Under Secretary Bill Hawks gave comments that the NAIS program is for disease control and management for animals from birth to point of slaughter. Working Group attendees with a catfish background were in consensus that the narrow scoped NAIS had little application or value within the U.S. farm-raised catfish production system. Almost all of our catfish are delivered live, from a known site (the farm), directly to a processing plant. There are no auction barns, feed-yards, livestock fair or exhibition sites for commingling with possible disease exposure in between. Additionally; catfish ponds are a part of diversified agriculture and are shown on USDA/FSA aerial maps for premises identification that can be supported by processing plant records that record receipts of fish by lot number with farm name and location.

We look forward to having catfish pond culture excluded and exempt from inclusion of the NAIS mandatory implementation.

Respectfully,

**HUGH WARREN
Exec. Vice-President**

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